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### UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

APR 14 2021 2:22 p.m.

Hon. Katharine S. Hayden UNITED STATES OF AMERICA

HON. JAMES B. CLARK, U.S.M.J.

Crim. No. 21- 310 (KSH)

CHRISTOPHER ODONITS, and

v.

ANTHONY MACDONALD

21 U.S.C. § 846

#### INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

#### COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine)

On or about November 20, 2019, in the District of New Jersey, and elsewhere, the defendants,

### CHRISTOPHER ODONITS, and ANTHONY MACDONALD,

did knowingly and intentionally conspire and agree with each other and with others to distribute and possess with intent to distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

#### FORFEITURE ALLEGATION

- 1. The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.
- 2. As a result of committing the narcotics offense charged in this Indictment, the defendants,

# CHRISTOPHER ODONITS, and ANTHONY MACDONALD,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting or derived from proceeds obtained directly or indirectly as a result of the violation of Title 21, United States Code, Section 846 alleged in this Indictment, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of said offense.

# Substitute Assets Provision

- 3. If any of the property described above, as a result of any act or omission of the defendants:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be

# divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendants up to the value of the forfeitable property described above.

A TRUE BILL

FOREPERSON

RACHAEL A. HONIG

Acting United States Attorney

CASE NUMBER: 21-310(KSH)\_\_\_\_\_

# United States District Court District of New Jersey

## UNITED STATES OF AMERICA

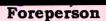
v.

# CHRISTOPHER ODONITS, and ANTHONY MACDONALD

# INDICTMENT FOR

21 U.S.C. § 846

A True Bill,



#### RACHAEL A. HONIG

ACTING U.S. ATTORNEY NEWARK, NEW JERSEY

GEORGE L. BRANDLEY ASSISTANT U.S. ATTORNEY (973) 353-6002

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